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VIA ELECTRONIC MAIL

January 25, 2002

Andrew Stephens
Director of Steel Trade Policy
Office of the U.S. Trade Representative
600 17th Street, N.W.
Washington, DC 20508

RE: *Section 203 Action: Certain Steel*
Amended Specification for Japanese Respondents' Exclusion Request for
Ultra Flat Cold-Rolled Steel (X-142.4)

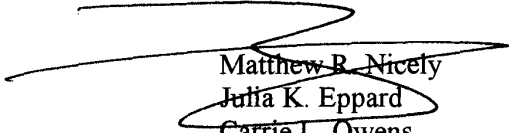
Mr. Stephens:

On behalf of Nippon Steel Corporation, NKK Corporation, Kawasaki Steel Corporation, Sumitomo Metal Industries, Ltd., Kobe Steel, Ltd., Nisshin Steel Co., Ltd, and the Japan Iron & Steel Exporters' Association ("Japanese Respondents"), we hereby submit amended definitions for our exclusion requests concerning ultra flat cold-rolled steel (X-142.4).

Attached are the original and revised definitions of ultra flat cold-rolled steel (X-142.4). This exclusion request was also submitted to the Office of the U.S. Trade Representative on November 13, 2001, and previously to the International Trade Commission during the injury and remedy phases of its investigation. In a December 5, 2001, submission, the domestic integrated mills objected to this exclusion request, claiming that a U.S. mill could produce the product. In order to respond to these claims, we submitted a revised, more detailed definition on January 17, 2002. Subsequently, we found inadvertent mistakes in the definition. Therefore, we are resubmitting the definition of ultra flat cold-rolled steel.

If you have any questions about this submission, please contact one of the undersigned.

Respectfully submitted,



Matthew R. Nicely
Julia K. Eppard
Carrie L. Owens

cc: Richard Weible
U.S. Department of Commerce

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AMENDED PRODUCT SPECIFICATIONS FOR ULTRA FLAT COLD-ROLLED STEEL (X-142.4)

The definition that was submitted on November 13, 2001, for ultra flat cold-rolled steel was:

Coiled tin mill black plate for automotive brakeline tubing, per ASTM A625 specification, vacuum degassed, with the following ladle analysis: 0.02-0.05% carbon, 0.18-0.45% (aim 0.30%) manganese, 0.015% maximum phosphorus, 0.025% maximum sulfur, 0.10% maximum copper, and 0.020-0.075% aluminum. The gauge is 0.0136 inch, with centerline gauge tolerance of 0.0003 inch and within-coil variation not to exceed 0.0004 inch total and the crown of the coil shall not exceed .0004 inch when measured along any straight line across the width of the coil. Other physical characteristics are as follows: T1 or T3 temper, 52-62 Rockwell for T3 or 45-52 for T1, continuously annealed (for T3 only), 25-65 microinch Ra profilometer range; matte surface finish; camber per ASTM A625 (aiming 1/2 standard tolerance); slit edge minus 0, +1/8 maximum, and edge burr 0.002 inch maximum.

The following revised definition was submitted on January 17, 2002:

1. Coiled tin mill black plate per ASTM A625 specification, vacuum degassed, with the following ladle analysis:
0.02-0.05% carbon, 0.18-0.45% (aim 0.30%) manganese, 0.015% maximum phosphorus, 0.025% maximum sulfur, 0.10% maximum copper, and 0.020-0.075% aluminum. The gauge is 0.0136 inch, with centerline gauge tolerance of 0.0003 inch and within-coil variation not to exceed 0.0004 inch total and the crown of the coil shall not exceed 0.0002 inch when measured along any straight line across the width of the coil. Other physical characteristics are as follows: T1 or T3 temper, 52-62 Rockwell for T3 or 45-52 for T1, batch annealed for T1, 25-65 microinch Ra profilometer range; matte surface finish; camber per ASTM A625 (aiming 1/2 standard tolerance); slit edge minus 0, +1/8 maximum, and edge burr 0.002 inch maximum.
2. Coiled tin mill black plate per ASTM A625 specification, vacuum degassed, with the following ladle analysis:
0.02-0.05% carbon, 0.18-0.45% (aim 0.30%) manganese, 0.015% maximum phosphorus, 0.025% maximum sulfur, 0.10% maximum copper, and 0.020-0.075% aluminum. The gauge is 0.0136 inch, with centerline gauge tolerance of 0.0003 inch and within-coil variation not to exceed 0.0004 inch total and the crown of the coil shall not exceed 0.0002 inch when measured along any straight line across the width of the coil. Other physical characteristics are as follows: T1 or T3 temper, 52-62 Rockwell for T3 or 45-52 for T1, continuously annealed for T3, 25-65 microinch Ra profilometer range; matte surface finish; camber per ASTM A625 (aiming 1/2 standard tolerance); slit edge minus 0, +1/8 maximum, and edge burr 0.002 inch maximum.

Please use the following definition for ultra flat cold-rolled steel:

1. Coiled tin mill black plate, per ASTM A625M (Batch Annealed):
 Vacuum degassed, continuously cast, batch annealed,
 With the following ladle analysis:

Carbon	0.03-0.08 %
Manganese	0.20-0.45 % (aim 0.30 %)
Phosphorous	0.015 % Max
Sulfur	0.025 % Max
Copper	0.10 % Max
Aluminum	0.020-0.075 %

 Gauge: 0.0105-0.0136 inch
 Centerline Gauge Tolerance: 0.0003 inch per length of coil.
 Coil Variation Tolerance: 0.0004 inch. (This means that the gauge variation from coil to coil cannot exceed 0.0004 inch.) This measurement is made down the entire length of the coil as a single point not less than 10 inches from either edge
 Crown Tolerance: The crown of the coil shall not exceed 0.0004 inch when measured along any straight line across the width of the coil (excluding the first 1/2 inch from either edge).
 Edge Burr Tolerance: 0.002 inch Max
 All other Tolerances as per ASTM A625 (aiming 1/2 standard tolerances)
 Temper: T1 or 42-52 Rockwell 30T scale rating

2. Coiled tin mill black plate, per ASTM A625M CAL T3 (Continuous Annealed):
 Vacuum degassed, continuously cast, continuously annealed,
 With the following ladle analysis:

Carbon	0.02-0.05 %
Manganese	0.18-0.45 % (aim 0.30 %)
Phosphorous	0.015 % Max
Sulfur	0.025 % Max
Copper	0.10 % Max
Aluminum	0.020-0.075 %

 Gauge: 0.0105-0.0136 inch
 Centerline Gauge Tolerance: 0.0003 inch per length of coil.
 Coil Variation Tolerance: 0.0004 inch. (This means that the gauge variation from coil to coil cannot exceed 0.0004 inch.) This measurement is made down the entire length of the coil as a single point not less than 10 inches from either edge.
 Crown Tolerance: The crown of the coil shall not exceed 0.0004 inch when measured along any straight line across the width of the coil (excluding the first 1/2 inch from either edge)
 Edge Burr Tolerance: 0.002 inch Max
 All other tolerances as per ASTM A625 (aiming 1/2 standard tolerances)
 Temper: T3 or 52-62 Rockwell 30T scale rating